

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANNE FLACCUS,

Plaintiff,

v.

ADVANCED DISPOSAL SERVICES
EASTERN PA, INC. f/k/a ADVANCED
DISPOSAL SERVICES SHIPPENSBURG,
LLC; and ADVANCED DISPOSAL
SERVICES SOUTH, LLC f/k/a
ADVANCED DISPOSAL SERVICES, INC.

Defendants.

Civil Action No. 2:17-cv-04808-MAK

**PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES,
REIMBURSEMENT OF EXPENSES, AND
A CLASS REPRESENTATIVE CASE CONTRIBUTION AWARD**

Plaintiff and Settlement Class Representative Anne Flaccus, by and through her undersigned counsel, hereby respectfully moves the Court, pursuant to Federal Rule of Civil Procedure 23, for an Order: (1) granting attorneys’ fees in the amount of \$733,333.00, which represents 33 1/3 % of the \$2,200,000.00 in Settlement Funds, and approving the allocation of those fees as set forth in the memorandum of law being filed contemporaneously herewith (the “Memorandum”); (2) directing reimbursement of a total of \$22,058.17 of expenses incurred in the prosecution of the action as further set forth in the Memorandum; (3) awarding a \$15,000.00 case contribution award to Plaintiff in recognition of her significant role in generating the Settlement Funds; and (4) for such other and further relief as the Court may deem just and proper.

The motion is based on the Memorandum, the declarations of Benjamin M. Mather and all exhibits thereto (including the Settlement Agreement), the declarations of Deborah R. Gross,

Anne Flaccus, and Barry Katz, and all pleadings and filings in this action. On or before August 3, 2023, Class Counsel will submit a proposed order encompassing both the instant motion and the previously filed motion for final approval.

Respectfully submitted,

Dated: June 26, 2023

/s/ Andrew J. Belli
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